ORIGINAL

BEFORE THE ARIZONA POWER PLANT AND

TRANSMISSION LINE SITING COMMITTEE

4700

IN THE MATTER OF THE APPLICATION OF ARIZONA PUBLIC SERVICE COMPANY IN CONFORMANCE WITH THE REQUIREMENTS OF ARIZONA REVISED STATUTES SECTION 40-360, et seq., FOR A CERTIFICATE OF ENVIRONMENTAL COMPATIBILITY AUTHORIZING THE WEST VALLEY NORTH 230KV TRANSMISSION LINE PROJECT, INCLUDING THE CONSTRUCTION OF APPROXIMATELY 25 MILES OF 230KV TRANSMISSION LINES AND TWO SUBSTATIONS IN MARICOPA COUNTY, ARIZONA, ORIGINATING AT THE TS2 SUBSTATION IN SECTION 25 TOWNSHIP 3 NORTH, RANGE 2 WEST, G&SRB&M AND CONTINUING TO THE PROPOSED TS1 SUBSTATION IN SECTION 20, TOWNSHIP 4 NORTH, RANGE 2 WEST, G&SRB&M AND TERMINATING AT THE PROPOSED TS5 SUBSTATION IN SECTION 29, TOWNSHIP 4 NORTH, RANGE 4 WEST, G&SRB&M	Docket No. L-00000D-04-0127 Case No. 127

Submittal of Public Comment

Purpose: To persuade the Transmission Line Sitting Committee that the ***"500-kV Corridor Alternative"*** is a better alignment than the current "Preferred Route".

Background: My wife and I own 120+/- acres (APN # 503-84-010A) which have approximately 2,827 feet (more than ½ mile) of frontage along the Northern border of the CAP Canal. Our property's frontage to the CAP canal is directly impacted by the current "Preferred Route". We are currently interviewing planners/engineers to assist in entitling and planning the property as a master planned community known as "Narramore Ranch" which will consist of appx. 360 residential dwellings. Narramore Ranch is located appx 2 miles from the White Tank Mountain Regional Park. The views of the mountains are beautiful, but it has one flaw—the existing 500kV corridor which is located ¾ mile to the South. I do not want to see the views of this property further destroyed by an entirely new corridor which departs from the existing 500kV/Regional Transmission Line Corridor.

Generally speaking, and from my perspective, the most objectionable issue associated with determining the location of a new transmission line is the permanent visual impact the soaring, above ground structures will create. If it was possible to underground a transmission line of this size cost effectively, I do not believe there would be a need for such an elaborate public process to determine transmission line locations—but an underground line is not an option in this case. I have organized my thoughts into three main areas which I hope will help to articulate why I believe the 500kV Corridor Alternative is the best overall location for the public good. These arguements include: 1) A regional transmission line corridor already exists, 2) More than any other option, the 500kv Corridor Alternative minimizes environmental impacts to the enormous number of future residences this area is expected to see, and 3) The 500kv Corridor Alternative is the most cost effective option.

A Regional Transmission Line Corridor Already Exists

There are 3 separate 500kV lines which meet up in a Parallel corridor beginning near the alignment of 267th ave. and the half-section line North of the Beardsley Road alignment (See photo #1&2 attached). These 3 independent 500kV lines then head East in a parallel manner to a point well beyond the scope of the study area boundary. My point is this… previous transmission line siting committees determined that for 13+/- miles within the study area, the 500kV lines should run parallel in one regional transmission line corridor (the "500kV Line Corridor").

The "Preferred Route" of the proposed 230kV power line appropriately runs parallel to the existing 500kV Line Corridor (a distance of appx. 6 miles) for that segment of the project which lies between the TS1 Substation and alignment of 243rd Ave. At the alignment of 243rd Ave, the Preferred Route of the proposed 230kV power line then departs from the 500kV Line Corridor for five miles, only to run into the same 500kV Line Corridor again near the alignment of 267th Ave. (hereafter this abandonment of the 500kv Line Corridor is fittingly referred to as the "5 Mile Detour"). In fact, if the proposed 230kV power line were to avoid the circuitous "5 Mile Detour" outlined within the "Preferred Route" and remain parallel to the 500kV Line Corridor it would reach its destination 1.5+/- miles sooner.

Recently, a new 69kV line was installed to service the needs of the same area in question (from approximately the TS1 Substation to 267th Ave). And where do you think the location of the new 69kv transmission line end up? The new 69kV line ended up being installed adjacent to the existing 500kV Line Corridor (see photo #3&4). Although 69kV lines are disclosed elsewhere in the Study Area, this new 69kV line is not reflected in any of the exhibits or newsletters mailed to the public. I believe that this undisclosed 69kV line is ***material*** to the public input and begs the question: If this 69kV line had been properly disclosed, would the "5 Mile Detour" in the application for a Certificate of Environmental Compatibility remain the "Preferred Route"?

The 3rd newsletter articulates that the "5 Mile Detour" in the preferred route "jogs north (following an existing fiber optic installation) to the Central Arizona Project Canal (CAP)". This statement can be misleading in that an individual may be led to believe that the "5 Mile Detour" is following an established transmission line where visual impacts and disturbances already exist. This is not the case. The "existing fiber optic installation" is an underground line which creates no visual disturbances (see photo #5).

Ask yourself these questions:

- Why create a second transmission line corridor when an established corridor exists?
- Why create an additional 5 miles of permanent visual scaring when it can absolutely be avoided?

Further argued, I believe that the addition of a 5th line to the existing 500kV Line Corridor would add very little visual impact to the 500kV Line Corridor—it's already impaired by the 4 existing transmission lines—Three 500kV lines & One 69kV line. Are you really going to notice a 5th transmission line? (see photo #6&7) The "5 Mile Detour" created by the "Preferred Route" would literally create 5 new miles of visual disturbances to the scenic area—and the worst part is the 500kV Line Corridor doesn't get any better looking… it still remains a looming visual disturbance to the scenic area.

Minimizing Environmental Impacts To <u>All</u> Future Residences:

In addition to my project, there are two much larger master planned communities which have already started the planning and development process: 1) Festival Ranch, and 2) Spurlock Ranch.

Both of these projects happen to be poised to capture some of the most explosive growth the valley has ever seen. The two projects lye in Buckeye near the border of Surprise. In the May 14th, 2003 edition of the Arizona Republic an article entitled "West Valley is Shaping Growth—Buckeye, Surprise's Populations to explode by 2040" states that the growth in Surprise & Buckeye, which can't come up with 60,000 people between them right now, will lead a steady shift in population from east to west over the next three decades. By 2040, more than 640,000 people will live in Maricopa County's third-largest city, Surprise, and an additional 600,000 will live in Buckeye.

Festival Ranch and Spurlock Ranch are impacted by the "Preferred Route" of the 230kV line differently. Representatives from Spurlock Ranch have stated they are opposed to the "5 Mile Detour" reflected in the Preferred Route. Spurlock Ranch would like to integrate the 500kV Corridor Alternative into the Preferred Route in that any other alignment would create additional visual disturbances to the project's views of the White Tank Mountain Regional Park. Festival Ranch, on the other hand, has been the driving force behind the "5 Mile Detour" in the Preferred Route.

The existing "500kV Line Corridor" completely bifurcates Del Webb/Pulte Home's 3,100 acre Festival Ranch project. Although Festival Ranch did not oppose the new 69 kV line which was very recently installed parallel to the 500kV Line Corridor, Festival Ranch is opposed to the 500kV Corridor Alternative, which would locate the 230kV line parallel to the 4 existing transmission lines.

In speaking with the Transmission Line Siting Project staff, the main consideration for the "5 Mile Detour" was to avoid perceived conflicts with the Festival Ranch Development. At the time the Transmission Siting Project began, Festival Ranch appropriately communicated a construction schedule to APS which indicated that by the time the Transmission Line Siting Project was complete, Festival Ranch would have built new homes in the area. Since that time Festival Ranch has experienced delays in obtaining a 404 permit and its original project timeline has been substantially delayed. Festival Ranch currently has ***No Existing Homes*** in conflict with the 500kV Corridor Alternative.

With the knowledge that this entire area will be developed into extremely large population bases within the immediate coming decades (as outlined by the Arizona Republic Article referenced above), **I believe that it is extremely short sited to think that by creating a new transmission line corridor (the "5 Mile Detour"—a literal addition of 5 new miles of visual disturbances), that the larger public good will ultimately be served.** Festival Ranch has already designed around the 4 transmission lines in the 500kV Line Corridor—it won't be impossible for them to deal with a 5th . Just think of it, Pulte Homes portion of Festival Ranch might represent appx 20,000 people at build out. The combined municipalities of Buckeye and Surprise are forecasted to represent 1,240,000 people in the coming decades. Doesn't in make sense that 20,000 people ultimately dealing with a 5th transmission line located in 1 Regional Transmission Line Corridor (with 4 existing transmission lines) is better than having the remaining population (appx 1,220,000 people) forced to endure TWO Transmission Line Corridors for perpetuity?

In reality, if Pulte Homes would cooperate with APS and the Transmission Line Siting Committee now, even their future residences would be less impacted by the 500kV Cooridor Alternative. What they don't realize is that the "5 Mile Detour" would still be visible to their residences as well. Who doesn't benefit from ONE REGIONAL TRANSMISSION LINE CORRIDOR (rather than the alternative of two)? Yes… I concede that Pulte Homes may experience an initial delay and inconvenience of shifting land plans to accommodate a 5th transmission line in the 500kV Line Corridor. But, in my mind, it is the far lesser of two evils. I believe that the short term sacrifices required of Pulte Homes are far outweighed by the long term solutions and public benefit associated with ONE REGIONAL TRANSMISSION LINE CORRIDOR.

The Most Cost Effective Option:

Back in Junior High Geometry class we all learned that the shortest distance between

two points is a straight line. The 500kV Corridor Alternative is the straight line solution and undoubtedly the shortest route for the proposed 230kV Transmission Line. The "5 Mile Detour" literally requires an additional 1.5+/- miles of additional towers and power lines to be installed. Assuming that construction and materials cost per mile are constant, the "5 Mile Detour" would cost **43% MORE** (5/3.5 miles) than the 500kV Corridor Alternative. In reality, costs are not constant, and if a detailed study of the "5 Mile Detour" vs. the 500kV Corridor Alternative were completed, I am confident one would discover that the construction, materials, and installations costs per mile would be dramatically different. The 500kV Corridor Alternative includes 2 angles which would require 2 heavy duty load bearing Towers. The "5 Mile Detour" includes 4 angles (2 of which are hard right 90° angles) which would require 4 heavy duty load bearing Towers and significantly more reinforcement, bracing, materials, and man hours for installation. Assuming that access roads and transmission line maintenance costs are constant over a per mile basis, one could also expect to see **43% MORE** maintenance costs above the 500kV Corridor Alternative due to the additional 1.5+/- miles included in the "5 Mile Detour". Last of all, in speaking with the Transmission Line Siting Project staff, it seems that, to a small degree, there is synergy created by the 500kV Corridor Alternative which results in a smaller Land purchase requirement. Essentially, this is due to the buffer zones which currently lye on both the north and the south sides of the existing 500kV Line Corridor. One of these buffer zones could be incorporated into a portion of at least one of the two buffer zones needed for the new 230kV Transmission Line. The "5 Mile Detour" would require the acquisition of two full size buffer zones on either side of the 230kV Transmission Line—which would again result in a higher cost.

Closing Analogy:

Please permit me to use a silly analogy that I hope will properly convey my point... The Scenic landscape and views of the White Tanks Mountain Regional Park are precious. Let's compare this beautiful scenic view to a brand new, fire engine red, Corvette. If the Corvette was involved in a pretty serious front end accident and the damage was not repaired, from that point on the damage would catch the attention of anyone who stopped to admire the car. Depending on where you stood--on the left/right side or the rear of the car, you may be able to minimize the amount of damage seen, but when standing in the front of the car the damage is very visible. This is obviously because the damage was localized to the front end. Ask your self how much more apparent or noticeable the damage would be if the Corvette were in a 2^{nd}, 3^{rd}, 4^{th}, or 5^{th} front end collision and each time the owner again consciously chose not to repair the damage. I tend to believe that the additional damage caused by the 2^{nd}, 3^{rd}, 4^{th}, and 5^{th} collisions becomes less and less noticeable-- not only to the owner, but also to the rest of society (Economics 101—Marginal Utility: The amount of benefit/injury derived from consuming one additional unit of a product or service). This is exactly how I feel about installing a 5th power line along the existing 500kv Line Corridor--it'll pretty much go unnoticed. However, if the "5 Mile Detour" is permitted to move forward-- then you've pretty much visually destroyed another brand new Corvette (area).

Summary:

The 500kV Corridor Alternative is the best overall location for the proposed West Valley—North 230kV power line. This alternative truly considers what is best for the long term public good. It capitalizes on the synergies associated with a Regional Transmission Line Corridor (the existing 500kV Line Corridor). It minimizes the lasting visual impacts the Transmission Line will have on the White Tank Mountain Regional Park and the huge population expected to reside in this area. It accurately is the most cost effective solution. The 500kV Corridor Alternative ultimately reduces the costs of electric energy to the end user (both in dollars saved and environmental / visual impact).

If I could be of help to the Transmission Line Siting Committee in any way, I would happily make myself available to discuss the issue.

Respectfully submitted,

Date: 1/24/2005

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Photos—all dated 12/24/04

Photo #1: 3 separate 500kV lines meet up into one 500kV Line Corridor

Photo #2: 500kV Line Corridor

Photo #3: new 69kV line—the 4th transmission line in the 500kV Line Corridor

Photo #4: new 69kV line—the 4th transmission line in the 500kV Line Corridor

Photo #5: underground fiber optic line

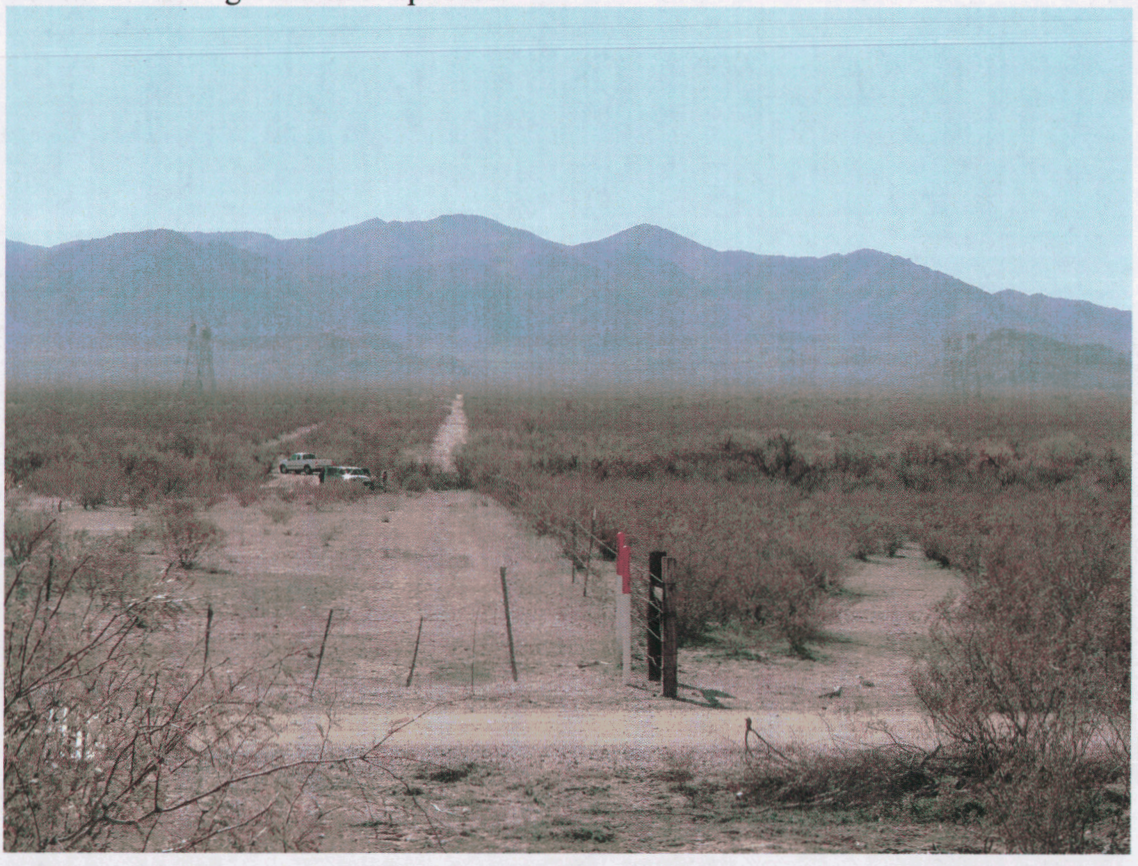

Photo #6: Would you notice the addition of a 5th line?

Photo #7: